



MAY 30 2008

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May 30, 2008

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Hon. John G. Koelz
United States District Judge
United States District Court
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street,
New York, New York 10007

Re: Gina Mattivi and Ryan Stango v. City of New York, et al.
08 CV 2800 (JGK)

Your Honor:

I am an attorney in the office of Michael A. Cardozo, Corporation Counsel of the City of New York, attorney for the defendant City of New York in this civil rights action alleging police misconduct. I am writing, with plaintiffs' counsel's consent, to respectfully request a further thirty-day enlargement of time from June 6, 2008 to July 7, 2008 to respond to the complaint on behalf of the City of New York¹, and that the initial conference, now scheduled for June 23, 2008 be adjourned to a date and time convenient to the Court after July 7, 2008.

We are seeking this additional enlargement because receipt of the N.Y. Criminal Procedure Law § 160.50 release was delayed, and, as such, the City has not yet received copies of the sealed District Attorney, Criminal Court and police records pertaining to plaintiffs' alleged arrest that are needed in order to properly frame a response to the complaint. The City now has the necessary releases and is moving expeditiously to obtain these crucial records.

Accordingly, it is respectfully requested that the City's time to respond to the complaint be enlarged an additional thirty days to July 7, 2008, and the initial conference be

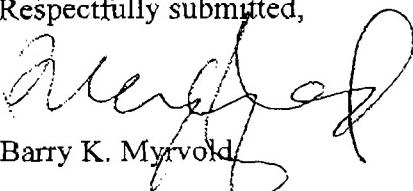
¹ Without appearing on behalf of the individually named defendants, Detectives Hook and Marsalisi, the City respectfully requests that the same enlargement be granted to them in order to ensure that their defenses are not jeopardized while representation issues are being decided.

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adjourned from June 23 to a date convenient to the Court after July 7, 2008. A request for a sixty-day enlargement of time to answer the complaint, and to adjourn the initial conference was previously made and granted by this Court

I thank the Court for its time and consideration of this request.

Respectfully submitted,


Barry K. Myrvold

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